Document No. 10928

435.36
04/14/99
Rev. 03

NEW SITE IDENTIFICATION

Part A – To Be Completed By Observer	
1. Person Initiating Report: Robert G. Akins	Phone: 526-7253
Contractor WAG Manager: Frank L. Webber	Phone: 526-8507

2. Site Title: PBF-33: Abandoned DebrisTrench.

3. Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.

3. There is a debris-filled trench located approximately 200 yards north of the MWSF at PBF. The trench is approx. 160 feet long by 10 feet wide, and the excavation depth is approximately 5 feet. (See map, Figure 1). The debris within the trench consists mainly of construction material (broken concrete slab and blocks, metal pipe, empty 55-gallon drums, gas cans, metal wire, tires, wood boards and other miscellaneous scrap) (see attached photos, Figures 2-#). The age of the debris in the trench is unknown because no visible markings could be seen under the snow and the corroded condition of the material. In addition, there are lengths of Transite (trade name for a mixture of concrete and asbestos) pipe, which have been determined to be friable asbestos (INEEL IH Laboratory Analytical Report – attached).

A radiological survey was performed on the asbestos and approximately 20% of the other items, and all direct scans were <100 counts per minute (cpm) above background for the beta-gamma scan, and there was no detectable alpha above background.

The presence of the 55-gallon drums and gas cans indicates that releases of chemicals and petroleum products could have occurred. The visible drums all appear to be open, and empty of liquids. It cannot be determined without further investigation if they were abandoned in this condition, or if liquids had been drained from the containers into the trench.

It has been proposed that the readily accessible Transite piping be bagged, removed and placed in the asbestos pit at CFA. Additional Transite piping could be present under the debris.

Part B – To Be Completed By Contractor WAG Manager

4. Recommendation:

☒ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO.
WAG: 10 Operable Unit: 10-08

☐ This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation and SHOULD NOT be included in the INEEL FFA/CO Action Plan.

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5. Basis for the recommendation:

The abandoned trench should be included as a site under the FFA/CO for further investigation for the following reasons:

1. Source Description: The source of the abandoned debris is unknown. It is possibly from the SPERT-IV reactor during the original construction activities or during early facility operation.
2. Exposure Pathways: Potential exposure pathways include inhalation from friable asbestos and possible soil contamination from possible leakage from drums/cans. Other potential exposure pathways are unknown due to the lack of information about the waste. Additional information is needed to determine whether contaminants at the site pose an unacceptable risk to human health and/or the environment.
3. Potential Contaminants of concern: Transite piping with friable asbestos was found. It is unknown what other potential contaminants may be present since no labels or identifiers are visible on any of the containers and it is unknown if there was waste in the drums/containers at the time of disposal. The site should be assessed to determine whether contamination is or was present and if so, do the levels of contaminants present unacceptable risk levels.
4. Descriptions of interfaces with other programs: Possible interfaces with other programs include the PBF facility operations and the Environmental Affairs Asbestos Program. The PBF facility is an active facility whereby personnel have the potential of coming into contact with materials and potential contaminants present in the abandoned trench site. Because the risk associated with the materials and potential contaminants is unknown, personnel may receive undue exposure.

The basis for recommendation must include: (1) source description; (2) exposure pathways; (3) potential contaminants of concern; and (4) descriptions of interfaces with other programs, as applicable (e.g., D&D, Facility Operations, etc.)

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in Section 4 above.

Name: Frank L. Webber Signature: Frank L. Webber Date: 12/21/00

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NEW SITE IDENTIFICATION

Part C – To Be Completed By INEEL FFA/CO WAG Managers

7. WAG Operable Unit:

DOE WAG Manager's Concurrence: ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: Carol A Hathaway

Date: 2-21-01

EPA WAG Manager's Concurrence: ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: [signature]

Date: 3/6/01

State of Idaho WAG Manager's Concurrence: ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: [signature]

Date: 3/13/01

Explanation follows:

Part D – To Be Completed By The INEEL FFA/CO Responsible Program Managers (RPM's)

8. FFA/CO RPM's Concurrence:

For DOE-ID

Name: Kathleen Hain Signature: Kathleen E Hain Date: 2/21/01

☒ Concur
☐ Do not concur. Explanation follows:

For EPA Region X

Name: Wayne Pierre Signature: [signature] Date: 3/7/01

☒ Concur
☐ Do not concur. Explanation follows:

For State of Idaho

Name: Dean Nygard Signature: Daryl J. Koch Date: 3/13/01

☒ Concur
☐ Do not concur. Explanation follows:

Douglas H Preussner
11/13/2000 08:57 AM

To: Timothy L Carlson/TCL/CC01/INEEL/US@INEL, Robert G Akins/RG2/CC01/INEEL/US@INEL, Doug S Vandel/DSV/CC01/INEEL/US@INEL
cc:
Subject: FW: Fact Sheet Abandoned Trench at WROC

FYI

---------- Forwarded by Douglas H Preussner/DPRES/CC01/INEEL/US on 11/13/2000 08:56 AM ----------

From: Carol A Hathaway@Exchange on 11/13/2000 08:21 AM

To: Christine Hiaring/HRG/CC01/INEEL/US@INEL, "Koch, Daryl" <DKoch@DEQ.state.ID.US>@SMTP@Exchange, "Livieratos, Ted" <tliviera@deq.state.id.us>@SMTP@Exchange, "Poeton, Rick" <Poeton.Rick@epamail.epa.gov>@SMTP@Exchange, Douglas H Preussner/DPRES/CC01/INEEL/US@INEL, Frank L Webber/FLW/CC01/INEEL/US@INEL
cc:
Subject: FW: Fact Sheet Abandoned Trench at WROC

fyi

-----Original Message-----
From: Hain, Kathleen E
Sent: Monday, November 13, 2000 8:17 AM
To: Hathaway, Carol A
Subject: FW: Fact Sheet Abandoned Trench at WROC

-----Original Message-----
From: Rasch, Donald N
Sent: Thursday, November 09, 2000 2:40 PM
To: Russell, Ralph W; Wessman, David L; Woolf, Stephanie A
Cc: Hain, Kathleen E
Subject: FW: Fact Sheet Abandoned Trench at WROC

FYI

-----Original Message-----
From: Hernandez, Nicole K
Sent: Thursday, November 09, 2000 10:06 AM
To: Rasch, Donald N
Subject: RE: Fact Sheet Abandoned Trench at WROC

Don, just sent you the photos and another message that includes some information, which is still not very much. Here is the fact sheet that I sent out.

Abandoned Trench-WROC.doc

Thanks
Nicole

-----Original Message-----
From: Rasch, Donald N
Sent: Thursday, November 09, 2000 10:03 AM
To: Hernandez, Nicole K
Subject: FW: Fact Sheet Abandoned Trench at WROC

Nicole: Would you send me the photos and a description of what the issue is? Thanks, Don

-----Original Message-----

Sent: Thursday, November 09, 2000 8:14 AM
To: Rasch, Donald N
Subject: FW: Fact Sheet Abandoned Trench at WROC

saw that Teresa is out.

-----Original Message-----
From: Bergholz, Warren E
Sent: Thursday, November 09, 2000 8:13 AM
To: Hernandez, Nicole K
Cc: Beausoleil, Geoffrey L; Fritz, Lori L; Perkins, Teresa L; Green, Lisa A; Bowman, Gerald C
Subject: RE: Fact Sheet Abandoned Trench at WROC

Thanks, Nicole. Any idea how long the trenches had been there?

-----Original Message-----
From: Hernandez, Nicole K
Sent: Wednesday, November 08, 2000 9:52 AM
To: ! Factsheet-DOEID
Cc: Caummisar, Richard C; Must, Thomas L
Subject: Fact Sheet Abandoned Trench at WROC

The attached is a Fact Sheet regarding an abandoned trench identified at WROC which contains various waste materials. Please call me if you have any questions.
<< File: Abandoned Trench-WROC.doc >>

Nicole K. Hernandez
DOE-ID Facility Representative RWMC/WROC
Phone 6-8949
Pager 7570

Fact Sheet

Date: 11/8/00

To: Distribution

From: Nicole K. Hernandez, Facility Representative
Radioactive Waste Management Complex (RWMC)/Waste Reduction Operations Complex (WROC)

Subject: Abandoned Trench

Summary

On ~~Thursday~~ Tuesday, 11/7/00, the RWMC Facility Representative was notified that an abandoned trench containing discarded material was discovered within the fenced area at WROC. The area included 2 sites. The first debris site is located to the ~~south~~ west of the MWSF. This area contained several pieces of broken transite material. The second debris site was located approximately 200 yards north ~~northeast~~ of the MSWF. This debris site consisted of a trenched area approximately 160' long by 10' wide. The trenched excavation appeared to be approximately 5' in depth. The material located within the trench mainly consisted of construction debris (i.e. broken concrete slab and block, metal pipe material, 55-gallon drums, gas cans, and misc. scrap metal debris); however, evidence of damaged/broken transite pipe debris and a panel of fiberglass insulation with a black asphalt type backing were noted within the debris filed. It appears that the trenches have not been used for several years.

BBWI Environmental Affairs (EA) personnel made a determination that the transite material is classified as a Category II nonfriable asbestos-containing cementous product which has historically been utilized for duct insulation, pipe construction, and siding. Due to mechanical damage and exposure to weather the transite debris located in the trench has been rendered friable. The reportable quantity for friable asbestos is one pound. The quantity observed in the trench was determined to be greater than 1 pound.

Actions Taken

1. Management and environmental support were notified.
2. Environmental support investigated the area to determine reportability requirements.
3. The Spill Notification Team was notified to ensure the proper reports were made.
4. DOE-ID and DOE-HQ personnel were notified of the event on 11/7/00. The event was categorized as an Unusual Occurrence Group 2.C (1) Environmental Hazardous Material Contamination.
5. Industrial Hygiene has been contacted to perform an investigation of the area on 11/8/00 to affirm the EA determination that the material found is friable asbestos-containing material.

Safety Significance

The improper disposal of waste has regulatory implications and potential environmental impact.

Robert G Akins
11/08/2000 02:27 PM

To: Frank L Webber/FLW/CC01/INEEL/US@INEL, Christine Hiaring/HRG/CC01/INEEL/US@INEL, Douglas H Preussner/DPRES/CC01/INEEL/US@INEL, Katherine M Davis/DAVIKM/CC01/INEEL/US@INEL
cc: Harold L Thorne/HLT/CC01/INEEL/US@INEL, Richard P Wells/WELLRP/CC01/INEEL/US@INEL, John F Marthis/JFM4/CC01/INEEL/US@INEL
Subject: Rush Asb. Spl./Final Report IHLAB 212

For your information. Bob

---------- Forwarded by Robert G Akins/RG2/CC01/INEEL/US on 11/08/2000 02:16 PM ----------

To: Robert G Akins/RG2/CC01/INEEL/US@INEL
cc:
Subject: Rush Asb. Spl./Final Report IHLAB 212

Enclosed is the results of the lab analysis of the pipe from the PBF dump. Unfortunately it looks like it is friable.....Dean

---------- Forwarded by Dean L Roberts/ROBEDL/CC01/INEEL/US on 11/08/2000 02:00 PM ----------

INEEL

Grayson E Downs 11/08/2000 12:36:32 PM

To: Ronald H Guymon/GUYMRH2/CC01/INEEL/US@INEL, James F Graham/JQG/CC01/INEEL/US@INEL, John D Griffin/JDG/CC01/INEEL/US@INEL, Bruce M Angle/BA4/CC01/INEEL/US@INEL, Catherine A Reno/RENOCA/CC01/INEEL/US@INEL, Loren M Gardner/GARDLM/CC01/INEEL/US@INEL, Dean L Roberts/ROBEDL/CC01/INEEL/US@INEL, John D Pyle/PYLEJD/CC01/INEEL/US@INEL
cc: Brian M Roethlisberger/ROETBM/CC01/INEEL/US@INEL
Subject: Rush Asb. Spl./Final Report IHLAB 212

Here is the result from the transite pipe at PBF.

---------- Forwarded by Grayson E Downs/DOWNGE/CC01/INEEL/US on 11/08/2000 12:35 PM ----------

Stella A Stevens
11/08/2000 12:28 PM

To: Grayson E Downs/DOWNGE/CC01/INEEL/US@INEL
cc:
Subject: Rush Asb. Spl./Final Report IHLAB 212

Attached is the final report on the pipe wrap submitted for analyses this morning. Ken and I saw friable chrysotile fibers where the surface was weathered.

IHLAB 00-212s.

INEEL
INDUSTRIAL HYGIENE LABORATORY
ANALYTICAL REPORT

Date: November 8, 2000	**Report No.: IHLAB 00-212**
Requester: Grayson Downs	**Address: CF 688 /MS 4141**
Date Sample(s) Submitted:November 8, 2000	**Date Analysis Completed: November 8, 2000**
Analysis: BULK SAMPLES FOR ASBESTOS	

The sample was analyzed by polarized light microscopy with dispersion staining (PLM/DS) per SOP-IHL-2.01 (which is similar to NIOSH 9002 and EPA Method 600/M4-82-020). Surface fibers were removed, mounted in 1.550 RI solution, and identified by optical techniques. Quantitation was based on a visual estimation of the volume.

If a sample contained more than one distinct type of material, each type was evaluated and reported individually. The minimum quantifiable amount is approximately 1% by this method. Asbestos in concentrations below this amount may be detected, but the concentration cannot be determined with any certainty. Thus, asbestos detected in samples at concentrations below 1% are noted as "< 1%".

The samples flagged WITH AN ASTERISK (*) by the 'Sample ID' number CONTAIN ASBESTOS.

Please note: Our records of your sample(s) are based on the "Lab ID" number. Please use that number if you have any questions.

ANALYTICAL RESULTS

Sample ID	Lab ID	Description	Composition
*PBF 01	2000-1510	A piece of pipe wrap. Material is similar to transite board, a mix of cement and asbestos fibers. Weathering has removed some of the surface cement and fibers are exposed and friable.	*** 35% Chrysotile** 65% Cement Matrix

Analyzed by: SAS(Signature on file) November 8, 2000

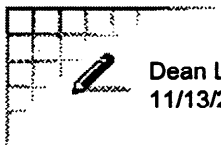
Reviewed by: KLT(Signature on file) November 8, 2000

Robert G Akins
11/13/2000 04:09 PM

To: Frank L Webber/FLW/CC01/INEEL/US@INEL, Christine Hiaring/HRG/CC01/INEEL/US@INEL, Douglas H Preussner/DPRES/CC01/INEEL/US@INEL, Richard P Wells/WELLRP/CC01/INEEL/US@INEL, Katherine M Davis/DAVIKM/CC01/INEEL/US@INEL, Harold L Thorne/HLT/CC01/INEEL/US@INEL, John F Marthis/JFM4/CC01/INEEL/US@INEL
cc:
Subject: Transite Near MWSF

For your information. Bob

---------- Forwarded by Robert G Akins/RG2/CC01/INEEL/US on 11/13/2000 04:04 PM

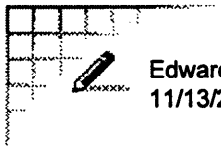


Dean L Roberts
11/13/2000 03:56 PM

To: Robert G Akins/RG2/CC01/INEEL/US@INEL
cc:
Subject: Transite Near MWSF

For your files. The transite is once again being called friable.

---------- Forwarded by Dean L Roberts/ROBEDL/CC01/INEEL/US on 11/13/2000 03:56 PM



Edward P Hart
11/13/2000 02:59 PM

To: Timothy L Carlson/TCL/CC01/INEEL/US@INEL, John D Pyle/PYLEJD/CC01/INEEL/US@INEL, Grayson E Downs/DOWNGE/CC01/INEEL/US@INEL, Robert W Tyng/TYN/CC01/INEEL/US@INEL, Dean L Roberts/ROBEDL/CC01/INEEL/US@INEL, Nicole K Hernandez@Exchange, Jack S Williams/WSJ/CC01/INEEL/US@INEL
cc:
Subject: Transite Near MWSF

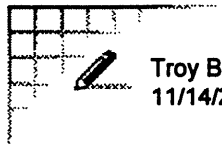
Today, myself, J. D. Pyle, G. E. Downs, R. W.Tyng, T. L. Carlson, J. S. Williams, N. K. Hernandez (DOE-ID), & D. L. Roberts walked down a construction dump north ~~east~~ of MWSF to identify whether or not transite pipe located at the construction dump was considered friable asbestos or non-friable asbestos. Based on 40 CFR 61.141 some of the transite piping meets the definition of friable asbestos. In light of this information the transite piping will be bagged and placed into the asbestos pit at CFA. No notifications are necessary for the cleanup work, although the cleanup of the transite piping will be included in a asbestos quarterly report issued by Environmental Affairs, under the direction of J. D. Pyle.

Dean L Roberts
11/14/2000 12:51 PM

To: Robert G Akins/RG2/CC01/INEEL/US@INEL
cc:
Subject: Rad Con Survey of Materials In The Trench at PER-613

Below is the note on what the rad con tech surveyed at the construction waste site at PER-613.....Dean

---------- Forwarded by Dean L Roberts/ROBEDL/CC01/INEEL/US on 11/14/2000 12:49 PM ----------



Troy B Terry
11/14/2000 12:28 PM

To: Dean L Roberts/ROBEDL/CC01/INEEL/US@INEL
cc: Lisa A Ruiz/LAR2/LMITCO/INEEL/US@INEL
Subject:

Dean, When I went down to the newly found asbestos dump site (that is just north ~~east~~ of MWSF) with you, I surveyed the asbestos that you had pointed out and approximately 20% of the other items in the trench. All direct scans with the Eberline 2A #800999 were <100cpm above bkg, and no detectable alpha above bkg with the Electra #801758.

It is my recomendation that if anyone is to dig up or move any of the debris, have an RCT with you to check out the item and the area. Just in case there is something buried that I did not detect.

RCT–Troy Terry.